

December 2, 2004

Ms. Debra A. Howland
Executive Director and Secretary
N.H. Public Utilities Commission
21 South Fruit St., Ste. 10
Concord N.H. 03301

Re: DE 03-113, PSNH Quality of Service to Bedford
Comments on Dufresne-Henry Report

Dear Ms. Howland:

Your letter of December 1, 2004 to Keith Hickey indicated the Public Utilities Commission's (Commission) intention to receive written public comments on the report of its consultant, Dufresne-Henry (DH). The Office of Consumer Advocate (OCA) reviewed the DH report and the history of these proceedings. Based upon this review, the OCA offers the following comments.

DH, like Vantage Consulting, Inc., identified customer communication as an area for PSNH's improvement. These consultants recognized and emphasized the importance of resolving voltage problems and of clear and responsive communication between the utility and its customers. An in-depth examination of PSNH's customer service system and more detailed recommendations, however, fell outside the scope of their review. The limited recommendations offered concerned the identification and use of more specific terminology and pointed questions during the complaint intake process.

In light of the lengthy history of complaints between PSNH and its Bedford customers and anecdotal evidence of PSNH's non-responsiveness, the OCA encourages PSNH to implement the consultants' recommendations for improvement in customer service. Further, the OCA recommends that PSNH closely scrutinize its system of customer service and take all action necessary to ensure that it is consistent, reliable and responsive to the needs of its customers. Particularly, the OCA urges PSNH to educate and empower its customer service representatives and customers, to help them understand the various components of electricity service and factors that may impact its quality.

Two other issues arose in the context of these proceedings: the limited scope of mandatory reporting of voltage complaints; and the need for review of the Commission's voltage range. The OCA considers both issues important, as their resolution implicates improved quality of service to residential customers.

Given the broad impact of these issues and their resolution, however, the OCA considers the rulemaking process a more appropriate context in which to address them. The rulemaking context also presents an opportunity for examination and consideration of industry-wide quality of service standards. In 2005, the Chapter 300 rules expire. During the re-promulgation process, the OCA will revisit these issues.

Pursuant to Puc 202.18, a copy of this letter has been mailed to the individuals on the service list for this docket. I thank you for your assistance and the Commission for its consideration of these comments.

Sincerely,

F. Anne Ross
Consumer Advocate

cc: Service List